

1 Lexi J. Hazam (SBN 224457)
2 *lhazam@lchb.com*
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
3 275 Battery Street, 29th Floor
4 San Francisco, CA 94111
Telephone: (415) 956-1000
Facsimile: (415) 956-1000
5

6 Christopher A. Seeger (*pro hac vice*)
cseeger@seegerweiss.com
SEAGER WEISS, LLP
7 55 Challenger Road, 6th Floor
8 Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 679-8656
9

10 *Plaintiffs' Co-Lead Counsel*

11 Previn Warren (*pro hac vice*)
pwarren@motleyrice.com
MOTLEY RICE LLC
12 401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610
Facsimile: (202) 232-5513
13

14

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

15 IN RE: SOCIAL MEDIA ADOLESCENT
16 ADDICTION PERSONAL INJURY
17 PRODUCTS LIABILITY LITIGATION

18 Case No. 4:22-md-03047-YGR (PHK)

19 MDL No. 3047

20 This Document Relates To

21 All Actions

**PLAINTIFFS' TEMPORARY SEALING
MOTION (SECOND AMENDED MASTER
COMPLAINT)**

Pursuant to the Court's Order Setting Sealing Procedures (Dkt. 341), Plaintiffs file the instant Temporary Sealing Motion requesting to file under seal Plaintiffs' Second Amended Master Complaint. The reasons for sealing will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Party Information
Dkt. 495-1	Exhibit A – Complaint, <i>State of Arizona et al. v. Meta Platforms, Inc., et al.</i> , No. 4:23-cv-05448 (N.D. Cal.), ECF No. 73-2 (Not Under Seal)	The document does not contain information designated as confidential by any party.
Dkt. 495-2	Exhibit B – Complaint, <i>State of New Mexico v. Meta Platforms, Inc., et al.</i> , No. D-101-cv-2023-02838 (First Judicial District Court, County of Sante Fe, New Mexico) (Redacted)	The document contains information designated as confidential by Defendants.
Dkt. 495-3	Exhibit B – Complaint, <i>State of New Mexico v. Meta Platforms, Inc., et al.</i> , No. D-101-cv-2023-02838 (First Judicial District Court, County of Sante Fe, New Mexico) (Under Seal)	The document contains information designated as confidential by Defendants.
Dkt. 495-4	Exhibit C – Complaint, <i>State of Utah v. TikTok, Inc.</i> , No. 230907634 (Third Judicial District Court, County of Salt Lake, Utah) (Redacted)	The document contains information designated as confidential by Defendants.
Dkt. 495-5	Exhibit C – Complaint, <i>State of Utah v. Tiktok, Inc.</i> , No. 230907634 (Third Judicial District Court, County of Salt Lake, Utah) (Under Seal)	The document contains information designated as confidential by Defendants.

DATED: December 15, 2023

Respectfully submitted,

/s/ Lexi J. Hazam
Lexi J. Hazam (SBN 224457)
lhazam@lchb.com
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000

1 Christopher A. Seeger (*pro hac vice*)
2 *cseeger@seegerweiss.com*
3 **SEEGER WEISS, LLP**
4 55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100

5 Previn Warren (*pro hac vice*)
6 *pwarren@motleyrice.com*
7 **MOTLEY RICE LLC**
8 401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610

9 *Plaintiffs' Co-Lead Counsel*

10 Joseph G. VanZandt
joseph.vanzandt@beasleyallen.com
11 **BEASLEY ALLEN CROW METHVIN PORTIS &**
12 **MILES, P.C.**
13 234 Commerce Street
Montgomery, AL 36103
Telephone: (334) 269-2343

14 Emily C. Jeffcott
ejeffcott@forthepeople.com
15 **MORGAN & MORGAN**
16 220 W. Garden Street, 9th Floor
Pensacola, FL 32502
17 Telephone: (850) 316-9100

18 Ron Austin
raustin@ronaustinlaw.com
19 **RON AUSTIN LAW**
20 400 Manhattan Blvd.
Harvey, LA 70058
21 Telephone: (504) 227-8100

22 Matthew Bergman
matt@socialmediavictims.org
23 Glenn Draper
glenn@socialmediavictims.org
24 **SOCIAL MEDIA VICTIMS LAW CENTER**
25 821 Second Avenue, Suite 2100
Seattle, WA 98104
26 Telephone: (206) 741-4862

1 James J. Bilsborrow
2 *jbilssborrow@weitzlux.com*
3 **WEITZ & LUXENBERG, PC**
4 700 Broadway
New York, NY 10003
Telephone: (212) 558-5500

5 Paige Boldt
6 *PBoldt@WattsGuerra.com*
7 **WATTS GUERRA LLP**
8 4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: (210) 448-0500

9 Thomas P. Cartmell
10 *tcartmell@wcllp.com*
11 **WAGSTAFF & CARTMELL LLP**
12 4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: (816) 701-1100

13 Jayne Conroy
jconroy@simmonsfirm.com
14 **SIMMONS HANLY CONROY, LLC**
15 112 Madison Ave, 7th Floor
New York, NY 1016
Telephone: (917) 882-5522

16 Carrie Goldberg
17 *carrie@cagoldberglaw.com*
18 **C.A. GOLDBERG, PLLC**
19 16 Court Street
Brooklyn, NY 11241
Telephone: (646)-8908

20 Kirk Goza
kgoza@gohonlaw.com
21 **GOZA & HONNOLD, LLC**
22 9500 Nall Avenue, Suite 400
Overland Park, KS 66207
Telephone: (913) 451-3433

23 Sin-Tiny Mary Liu
mliu@awkolaw.com
24 **AYLSTOCK WITKIN KREIS & OVERHOLTZ,**
25 **PLLC**
26 17 East Main Street, Suite 200
Pensacola, FL 32502
Telephone: (510) 698-9566

1 Andre Mura
2 *amm@classlawgroup.com*
3 **GIBBS LAW GROUP LLP**
4 1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: (510) 350-9717

5 Emmie Paulos
6 *epaulos@levinlaw.com*
7 **LEVIN PAPATONIO RAFFERTY**
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: (850) 435-7107

8 Roland Tellis
9 *r.tellis@baronbudd.com*
10 David Fernandes
d.fernandes@baronbudd.com
11 **BARON & BUDD, P.C.**
12 15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333

13 Alexandra Walsh
14 *a.walsh@alexwalshlaw.com*
15 **WALSH LAW**
16 1050 Connecticut Ave. NW, Suite 500
Washington, DC 20036
Telephone: (202) 780-3014

17 Michael M. Weinkowitz
18 *mwinkowitz@lfsblaw.com*
19 **LEVIN SEDRAN & BERMAN, LLP**
20 510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500

21 Diandra “Fu” Debrosse Zimmermann
fu@dicellolevitt.com
22 **DICELLO LEVITT**
23 505 20th Street North, Suite 1500
Birmingham, AL 35203
Telephone: (205) 855-5700

24 Robert H. Klonoff
25 *klonoff@usa.net*
26 **ROBERT KLONOFF, LLC**
27 2425 SW 76th Avenue
Portland, OR 97225
Telephone: (503) 702-0218

1 Hillary Nappi
2 *hnappi@hrsclaw.com*
3 **HACH & ROSE LLP**
4 112 Madison Avenue, 10th Floor
New York, NY 10016
Telephone: (212) 213-8311

5 Anthony K. Bruster
6 *akbruster@brusterpllc.com*
7 **BRUSTER PLLC**
8 680 N. Carroll Avenue, Suite 110
Southlake, TX 76092
Telephone: (817) 601-9564

9 Francois M. Blaudeau
10 *francois@southernmedlaw.com*
11 **SOUTHERN INSTITUTE FOR MEDICAL AND**
12 **LEGAL AFFAIRS**
13 2762 BM Montgomery Street, Suite 101
Homewood, AL 35209
Telephone: (205) 564-2741

14 James Marsh
15 *jamesmarsh@marshlaw.com*
16 **MARSH LAW FIRM PLLC**
17 31 Hudson Yards, 11th Floor
New York NY 10001
Telephone: (212) 372-3030

18
19
20
21
22
23
24
25
26
27
28
Attorneys for Plaintiffs

SIGNATURE ATTESTATION

The CM/ECF user filing this paper attests that concurrence in its filing has been obtained from its other signatories.

/s/ Andre M. Mura
Andre M. Mura